

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GMA ACCESSORIES, INC.,

EFC Case

Plaintiff,

Civil Action No.: 07 CV 8414 (LAK)

- against -

ePARTNERS, INC.,

Defendant.

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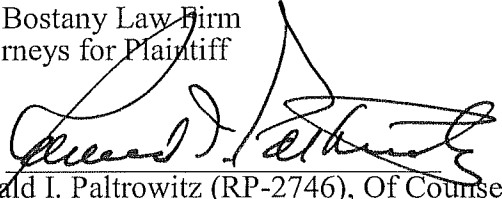
**NOTICE OF MOTION TO COMPEL RESPONSES TO JANUARY 7, 2008
DOCUMENT REQUESTS**

COUNSELLORS:

PLEASE TAKE NOTICE that, upon the Declaration of Ronald I. Paltrowitz, Esq., dated June 11, 2008, and the exhibits annexed thereto, and upon all prior pleadings and proceedings heretofore had herein, the undersigned will move this Court, at such time and place as the Court may direct, for an Order, pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure ("Fed.R.Civ.P."): compelling Defendant to comply with Requests I and J of Plaintiff's First Request for Documents, dated January 7, 2008; and to produce all documents that were prepared prior to the termination of the contract and all documents that were merely copied to e-Partners's general counsel,, and for such other relief as this Court may deem just and proper.

Dated: New York, New York
May __, 2008

The Bostany Law Firm
Attorneys for Plaintiff

By: 
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